

## Exhibit 3

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1                   UNITED STATES DISTRICT COURT  
2                   NORTHERN DISTRICT OF OHIO  
3                   EASTERN DIVISION

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7   IN RE:   NATIONAL PRESCRIPTION      MDL NO. 2804  
8   OPIATE LITIGATION

9  
10                  Case No.  
11                  17-md-2804

12                  Judge Dan Aaron  
13                  Polster

14                  This document relates to:

15                  The County of Summit, Ohio, et al. v. Purdue  
16                  Pharma L.P., et al.

17                  Case No. 18-OP-45090 (N.D. Ohio)

18                  ~ ~ ~ ~ ~

19                  Videotaped Deposition of

20                  KENNETH R. BALL II

21                  November 7, 2018  
22                  9:04 a.m.

23                  Taken at:

24                  Hilton Garden Inn  
25                  1307 East Market Street  
                     Akron, Ohio

Stephen J. DeBacco, RPR

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1 APPEARANCES:

2  
3 On behalf of the City of Akron, Summit  
4 County, and the Witness:  
5 Motley Rice LLC, by  
6 JAMES W. LEDLIE, ESQ.  
7 CAROLINE RION, ESQ.  
8 28 Bridgeside Boulevard  
9 Mt. Pleasant, South Carolina 29464  
10 (843) 216-9252  
11 jledlie@motleyrice.com  
12 (843) 216-9168  
13 crion@motleyrice.com  
14

15 On behalf of McKesson Corporation:

16 Covington & Burling, by  
17 JENNIFER SAULINO, ESQ.  
18 One CityCenter  
19 850 Tenth Street Northwest  
20 Washington, D.C. 20001-4956  
21 (202) 662-5305  
22 jsaulino@cov.com  
23

24 - and -  
25

Covington & Burling, by  
STEPHEN F. RAIOLA, ESQ.  
One CityCenter  
850 Tenth Street Northwest  
Washington D.C., 20001-4956  
202-662-5786  
sraiola@cov.com

26 ~ ~ ~ ~ ~  
27  
28  
29  
30

1 APPEARANCES, Continued:

2 On behalf of Johnson & Johnson and  
3 Janssen Pharmaceuticals, Inc.:

4 Tucker Ellis, LLP, by  
5 BREND A. SWEET, ESQ.  
6 950 North Main Avenue, Suite 1100  
7 Cleveland, Ohio 44113  
8 (216) 696-2493  
9 brenda.sweet@tuckerellis.com

10 On behalf of Endo Health Solutions, Inc.,  
11 and Endo Pharmaceuticals, Inc., via  
12 Teleconference:

13 Baker Hostetler, by  
14 TERA N. COLEMAN, ESQ.  
15 Key Tower  
16 127 Public Square, Suite 2000  
17 Cleveland, Ohio 44114-1214  
18 (216) 861-7582  
19 tcoleman@bakerlaw.com

20 On behalf of Prescription Supply, Inc.:  
21 Pelini, Campbell & Williams, by  
22 KRISTEN E. CAMPBELL TRAUB, ESQ.  
23 Bretton Commons, Suite 400  
24 8040 Cleveland Avenue Northwest  
25 North Canton, Ohio 44720  
~ ~ ~ ~ ~

On behalf of Walmart, Inc.:

Jones Day, by  
LISA B. GATES, ESQ.  
901 Lakeside Avenue  
Cleveland, Ohio 44114-1190  
(212) 586-7154  
lgates@jonesday.com

1 APPEARANCES, Continued:

2 On behalf of Walgreens:

3 Bartlit Beck LLP, by  
MATTHEW BREWER, ESQ.

4 54 West Hubbard Street  
Chicago, Illinois 60654  
(312) 494-4432

5 battew.brewer@bartlitbeck.com

6

7 On behalf of Allergan Finance, LLC, via  
Veritext Virtual:

8

9 Kirkland & Ellis LLP, by  
TUCKER HUNTER, ESQ.

10 300 North LaSalle  
Chicago, Illinois 60654  
(312) 862-3758

11 tucker.hunter@kirkland.com

12

13 On behalf of Cardinal Health, Inc.:

14

15 Williams & Connolly LLP, by  
MIRANDA PETERSEN, ESQ.  
725 12th Street Northwest  
Washington, D.C. 20005  
(202) 434-5686

16 mpetersen@wc.com

17

18 On behalf Endo Health Solutions, Inc.,  
and Endo Pharmaceuticals, Inc.:

19

20 Arnold & Porter, by  
JOHN D. LOMBARDO, ESQ.  
777 South Figueroa Street  
44th Floor  
21 Los Angeles, California 90017-5844  
john.lombardo@arnoldporter.com

22

23 ~ ~ ~ ~ ~

24

25

Page 5

1 APPEARANCES, Continued:

2

3 On behalf of AmerisourceBergen, via  
4 Teleconference:

5

Reed Smith, LLP, by

6

NICHOLAS R. RODRIGUEZ, ESQ.

7

Three Logan Square

8

1717 Arch Street, Suite 3100

9

Philadelphia, Pennsylvania 19103

10

(215) 241 7947

11

nrodriguez@reedsmith.com

12

~ ~ ~ ~ ~

13

14 ALSO PRESENT:

15

Richard Hand, Morgan, Lewis &  
16 Bockius, via Teleconference

17

18

Shaun Crum, Legal Videographer

19

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22

23

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1 the question.

2 A. That could happen.

3 Q. Okay. So it's -- I think, as you  
4 said, certainly plausible that individuals who  
5 end up overdosing on an opioid never intended  
6 to take one, right?

7 MR. LEDLIE: Object to the form of  
8 the question.

9 A. That could be the case.

10 Q. All right. We've talked about the  
11 opioid epidemic and your understanding of it.

12 Do you believe that Akron faces a  
13 prescription opioid epidemic?

14 MR. LEDLIE: Object to the form of  
15 the question.

16 A. I do.

17 Q. And when did that prescription  
18 opioid epidemic begin, in your opinion?

19 A. I believe that it -- that it  
20 started in -- like I had mentioned before, in  
21 the late '90s when we started to see a  
22 significant number of -- of reports and other  
23 interactions that suggested that.

24 - - - - -

25 (Thereupon, Deposition Exhibit 6,

1 because they're computer-generated reports.

2 Q. Do you recall discussing, with your  
3 leadership at the time, that you were seeing  
4 these increases?

5 MR. LEDLIE: Object to the form of  
6 the question.

7 A. I don't recall specifically. I do  
8 know that there was a change in -- in awareness  
9 about -- hadn't heard of OxyContin. Hear of  
10 OxyContin, and then start to see another  
11 report, another report, another report, and,  
12 you know, Percocet and some of the other  
13 prescription medications, then, that were  
14 frequently being reported as stolen or stolen,  
15 it stood out.

16 Q. Right. And I -- and I just want to  
17 understand. I know it stood out to you. Are  
18 you aware that it stood out to others as well?

19 A. Through -- yes. I mean, through  
20 casual conversations that I wouldn't be able to  
21 pinpoint, you know, "I spoke to Sergeant  
22 Jones," you know, "on this date about it."  
23 But, yes, there was a growing familiarity  
24 within the department that that was  
25 problematic.

1 Q. Starting in the late 1990s?

2 A. I think so.

3 Q. Okay. Have you ever sought a  
4 budget allowance specific to anything caused by  
5 opioids?

6 A. Can you restate that?

7 Q. Sure. Have you ever -- have you  
8 ever asked for any kind of a specific budget  
9 allowance related to opioids in any way?

10 MR. LEDLIE: Object to the form.

11 A. No, other than people resources,  
12 I've not had a financial request.

13 Q. You say "other than people  
14 resources." Have you asked for specific people  
15 resources related to opioids?

16 A. Yes.

17 Q. Tell me about that.

18 A. The first two -- this wasn't me  
19 asking at that point in time, but the -- the  
20 first two detectives that were dedicated, they  
21 were taking from our -- taken from our  
22 narcotics or bid, in addition to our current --  
23 the staffing at that time for narcotics, two  
24 positions for opioid death investigations.

25 Then there was another point that